

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

MATTHEW KOTILA and ROBERT CRAUN,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

CHARTER FINANCIAL PUBLISHING
NETWORK, INC.,

Defendant.

Case No. 1:22-CV-00704-HYJ-RSK

CLASS ACTION

**DECLARATION OF PATRICK M.
PASSARELLA OF KROLL SETTLEMENT
ADMINISTRATION LLC REGARDING
SETTLEMENT FUNDING AND
ADMINISTRATION COSTS**

The Hon. Hala Y. Jarbou

I, Patrick M. Passarella, declare as follows:

INTRODUCTION

1. I am a Senior Director of Kroll Settlement Administration LLC (“Kroll”),¹ the Settlement Administrator appointed in the above-captioned case, whose principal office is located at 2000 Market Street, Suite 2700, Philadelphia, Pennsylvania 19103. I am over 21 years of age and am authorized to make this declaration on behalf of Kroll and myself. The following statements are based on my personal knowledge and information provided by other experienced Kroll employees working under my general supervision. This declaration is being filed to provide information to the Court regarding payment of the Settlement Fund by Defendant and the amount of Settlement Administration Expenses Kroll is owed to date.

2. Kroll has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities fraud, labor and employment, consumer, and

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Class Action Settlement Agreement (the “Settlement Agreement”) entered into in this Action.

government enforcement matters. Kroll has provided notification and claims administration services in more than 3,000 cases.

SETTLEMENT FUND INFORMATION

3. The original terms of the Settlement Agreement provided that Defendant shall pay into the Escrow Account the amount of the Settlement Fund (\$1,000,000.00) within sixty (60) days after Final Approval. Kroll's duties under the Settlement Agreement include serving as Escrow Agent for the Settlement Fund.

4. Pursuant to the Court's *Final Judgment and Order of Dismissal with Prejudice*, entered on June 26, 2024, the deadline to fund the settlement was extended to December 2, 2024.

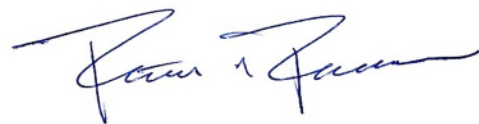
5. As of December 3, 2024, no funds have been received from Defendant for deposit into the Escrow Account.

SETTLEMENT ADMINISTRATION EXPENSES

6. As of December 3, 2024, Kroll has billed \$27,906.88 for Settlement Administration Expenses. Pursuant to the Settlement Agreement, all Settlement Administration Expenses are to be paid from the Settlement Fund. To date, Kroll has not otherwise received payment from Defendant for Settlement Administration Expenses. Billing for this matter is ongoing and is subject to change depending on the work that remains to be done, the anticipated cost of each item, and any settlement administration scope change not currently under consideration.

CERTIFICATION

I declare under penalty of perjury under the laws of the United States that the above is true and correct to the best of my knowledge and that this declaration was executed on October 4, 2024, in Wendell, North Carolina.



PATRICK M. PASSARELLA